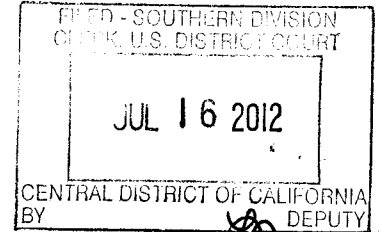


1 PAUL S. MEYER (State Bar No. 51146)
2 PAUL S. MEYER, A PROFESSIONAL CORPORATION
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4 Costa Mesa, California 92626
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5 Attorney for Defendant
CARLTON NEIL MORSE

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

11 UNITED STATES OF AMERICA

12 Plaintiff,

13 vs.

14 CARLTON NEIL MORSE,

15 Defendant.

CASE NO. SACR11-00170-AG

DEFENDANT'S *EX PARTE*
APPLICATION FOR ORDER
SEALING DOCUMENT;
DECLARATION OF PAUL S. MEYER

[PROPOSED] ORDER SEALING
DOCUMENT FILED SEPARATELY

~~FILED UNDER SEAL~~

LODGED

2012 JUL 13 PM 2:40

CLERK U.S. DISTRICT COURT
CENTRAL DIST. OF CALIF.
SANTA ANA

1 Defendant CARLTON NEIL MORSE hereby applies *ex parte* for an order that
2 the Defendant's Supplemental Sentencing Memorandum, as well as this *ex parte*
3 application, be filed under seal.

4 This *ex parte* application is based on the attached declaration of Paul S. Meyer.
5
6

7 Dated: July 13, 2012

Respectfully submitted,

8 PAUL S. MEYER
9 A PROFESSIONAL CORPORATION

10 

11 PAUL S. MEYER
12 Attorney for Defendant
13 CARLTON NEIL MORSE
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DECLARATION OF PAUL S. MEYER

I, PAUL S. MEYER, declare as follows:

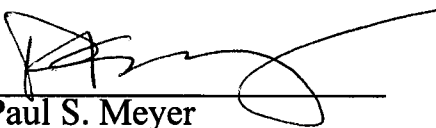
1. I am the attorney for Defendant Carlton Neil Morse.

2. The Defendant requests leave to file Defendant's Supplemental Sentencing Memorandum in this matter under seal. The Supplemental Sentencing Memorandum discloses the fact that defendant has cooperated with the government investigation. Disclosure could subject Mr. Morse to harm and render him vulnerable were he to be incarcerated. Further, disclosure could chill other defendants' willingness to provide cooperation in other matters in the future.

3. Accordingly, the Defendant requests that Defendant's Supplemental Sentencing Memorandum, which is being filed concurrently with this application, together with this application, be filed under seal.

4. Should the court deny this application, the Defendant requests that the Supplemental Sentencing Memorandum and this application not be filed, but returned to the Defendant, without filing of the documents or reflection of the name or nature of the documents on the clerk's public docket.

I declare under penalty of perjury that the foregoing is true and correct and would so testify in court. Executed this 13th day of July, 2012, at Costa Mesa, California.



Paul S. Meyer

1 **PROOF OF SERVICE**

2 STATE OF CALIFORNIA, COUNTY OF ORANGE

3
4 I am employed in the County of Orange, State of California, at the Law Offices
5 of Paul S. Meyer, APC, 695 Town Center Drive, Suite 875, Costa Mesa, California
6 92626. I am over the age of 18 and not a party to the within action.


7 On July 13, 2012, I served a true copy of the foregoing document described as
8 **DEFENDANT'S EX PARTE APPLICATION FOR ORDER SEALING**
9 **DOCUMENT; DECLARATION OF PAUL S. MEYER [FILED UNDER SEAL]**
10 on the parties in this action as follows:

11
12 Rob.Keenan@usdoj.gov
13 Robert J. Keenan
Assistant United States Attorney

Kathleen.Peralta@cacp.uscourts.gov
Kathleen Peralta
United States Probation Officer

14
15 **XX BY EMAIL SERVICE:** I caused a true copy of such document to be
16 transmitted by email to the addresses indicated above.

17
18 I declare under penalty of perjury under the laws of the State of California that
19 the above is true and correct and would so testify in court. Executed on July 13,
20 2012, at Costa Mesa, California.

21
22 
23 Kristin Hoang
24
25
26
27
28